

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
THE ENERGY CONSORTIUM

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to The Energy Consortium the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to The Energy Consortium in this proceeding.

1. "TEC@ means The Energy Consortium, its officers, directors, employees, consultants, and attorneys.
2. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number (for example, DTE-MECo-1-1), the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
3. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if TEC or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If TEC finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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Information Requests

Information Requests Related to the Pre-filed Testimony of Elaine Saunders

DTE-TEC-1-1 In reference to the pre-filed testimony of Elaine Saunders at 4, please state the units of the items shown under columns labeled AAll G-3" and ACogens@ and provide all the supporting data used as the basis for calculating the indicated figures.

DTE-TEC-1-2 Please develop a schedule for each NSTAR affiliate, similar to the schedule shown on page 4 of the pre-filed testimony of Elaine Saunders, using the NSTAR Electric data to be provided in response to The Energy Consortium's information request as noted on page 5, lines 6-8, of the testimony.

DTE-TEC-1-3 In reference to the pre-filed testimony of Elaine Saunders at 10, lines 12-14, please provide any available data showing Acustomers with multiple generating units.@ Provide historical data on failure rates of each generating unit in each customer's portfolio of generating units.

Dated: March 26, 2004